

# EXHIBIT A

Depo Dates  
9/10/2021

**MNAA/COLONIAL/AECOM PROPOSED DATES FOR DEPOSITIONS**

AUGUST 2021						
S	M	T	W	TH	F	SA
22	23	24	25	26	27	28
29	30 D. Jacobsen Prep Day	31 <b>Dan Jacobsen (Colonial) Atlanta for MNAA / Zoom for AECOM</b>				

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SEPTEMBER 2021						
S	M	T	W	TH	F	SA
	<i>D. Jacobsen Prep Day</i>	Dan Jacobsen (Colonial) Atlanta for MNAA / Zoom for AECOM	1 Traci Holton (MNAA) Nashville	2	3 David Gibbs (MNAA) Nashville	4
5	6 LABOR DAY	7	8 Shane Hester (TDOT) Nashville by Zoom	9 I. Rodrigues Prep Day	10 Igor Rodrigues (Colonial) Atlanta by Zoom	11
12	13 GS OUT THIS WEEK	14 GS Out Frederick Miller Depo (TDOT) Nashville (CC has hard stop at 4:00)	15 GS, CC Out	16 GS, CC, JZ Out	17 GS, CC, JZ Out	18
19	20  Russell Shelton (TDOT) Nashville	21 GS Out	22 Jim Morinec AECOM Nashville	23	24  Karen Hughes (TDOT) Knoxville	25
26	27 30(b)(6) Kleinfelder Atlanta One witness in person; one by Zoom	28 GS Out	29 Cody Mitchell Depo (AECOM) Nashville	30 PD Out		

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OCTOBER 2021						
S	M	T	W	TH	F	SA
					1 Don Pozin Prep Atlanta	2
3	4 <b>Don Pozin Depo Colonial Atlanta</b>	5 GS, CC Out	6 Jim Avioli Depo Prep	7 <b>Jim Avioli Depo Colonial Texas</b>	8 <i>Cody Crews /Gresham Depo (not confirmed with witness)</i>	9
10	11 Prep Chris White (Baton Rouge)	12 <b>Chris White Depo (Baton Rouge)</b>	13 <b>David Schilling/Atkins 30(b)(6) Depo</b>	14 JZ Out	15 JZ Out	16
17	18 CC out	19 CC and GS out  Perry Sisk Prep By Zoom	20 <b>Perry Sisk Depo (Colonial) By Zoom</b>	21 CC out  Olay Depo Prep	22 <b>Olay Saysanavong Depo (Colonial) Atlanta</b>	23
24 Kevin Raley Depo Prep	25 <b>BMD Out Kevin Raley Depo (Colonial) Atlanta</b>	26 <i>Carla Pinckney Depo Prep</i>	27 <i>Carla Pinckney (former Colonial) Atlanta (not confirmed with witness – will need to subpoena)</i>	28 CC Out <b>Ken Whatley (MNA) White House or driver</b>	29 CC Out <b>Michael Fulghum Depo (MNA) Nashville</b>	30

Depo Dates  
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NOVEMBER 2021						
S	M	T	W	TH	F	SA
	1 CC out  <b>Donald Strickland (Tuscaloosa) (he has to work that night)</b>	2 <b>MNAA 30(b)(6) Nashville</b>	3 <b>MNAA 30(b)(6)  Nashville</b>	4 JZ Out	5 CC out, JZ Out	6
7	8 <b>Colonial 30(b)(6) Atlanta</b>	9 <b>Colonial 30(b)(6) Atlanta</b>	10	11 <b>AECOM 30(b)(6) Nashville</b>	12 <b>Todd McFarland Wood Envl Nashville</b>	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				